

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ZACKARY ELLIS SANDERS,

Defendant.

Case No. 1:20-cr-00143

Honorable T.S. Ellis, III

Sentencing: Apr. 1, 2022

**MOTION TO SEAL**

The defendant, Zackary Ellis Sanders, by counsel, moves this Honorable Court for entry of an Order permitting the defense to file under seal portions of Mr. Sanders's Memorandum in Support of his Motion for New Trial and to Reconsider Motions to Compel and Motions to Suppress, as well as portions of Exhibits 1, 5, 8, 20, and 45, and the entirety of Exhibit 44. Mr. Sanders relies on the accompanying Memorandum as grounds for this motion.

Respectfully submitted,

/s/  
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*Counsel for Defendant Zackary Ellis Sanders*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 14<sup>th</sup> day of March 2022, the foregoing was served electronically on the counsel of record through the US District Court for the Eastern District of Virginia Electronic Document Filing System (ECF) and the document is available on the ECF system.

/s/ Jonathan Jeffress  
Jonathan Jeffress